IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF ALABAMA

IN RE:

Georgia Thomas, Debtor(s).

CHAPTER 13

CASE NO. 16-32655

OBJECTION TO CONFIRMATION

COMES NOW Republic Finance, LLC., a creditor in the above case, and objects to confirmation of the Debtor's Plan for the following reasons:

- 1. The Debtor pledged property in which Republic Finance, LLC. has a security interest. the claim of Republic Finance, LLC. ought to be secured for more value as the property is currently undervalued.
- 2. The Plan was filed in bad faith.

WHEREFORE, the Creditor objects to confirmation of the Debtor's Plan for the above reasons, as well as any other reason that could be brought out at an Evidentiary Hearing.

/s/ Richard C. Dean, Jr.
Attorney for Republic Finance, LLC.

OF COUNSEL P.O. Box 1028 Montgomery, AL 36101-1028 334-264-2896 RCD

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the forgoing upon the following interested parties electronically (CM/ECF) or by placing a copy of the same in the United States mail, postage prepaid and properly addressed on the date that this document is filed in the above case.

Georgia Thomas 411 West Patton Ave Montgomery, Al. 36105 Richard D. Shinbaum, Esq. 566 South Perry St Montgomery, Al. 36101-0201 Sabrina L. Mckinney, Esq. P.O. Box 173 Montgomery, Al. 36101

/s/ Richard C. Dean, Jr.
OF COUNSEL